

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CREEDON CONTROLS, INC., a Delaware)	
corporation,)	
)	C.A. NO. 05-CV-300-JJF
Plaintiff,)	
)	
v.)	
)	
BANC ONE BUILDING CORPORATION, an)	
Illinois corporation, and FOREST)	
ELECTRIC CORPORATION, a New York)	
corporation,)	
Defendants.)	
)	
)	

NOTICE OF DEPOSITION *DUCES TECUM*

PLEASE TAKE NOTICE that counsel for Defendant Banc One Building Corporation will take the deposition, under oath, of Patricia Creedon, commencing on May 22, 2006, at 9:30 a.m., and will continue thereafter from day to day until completed, at the law offices of Ashby & Geddes, 222 Delaware Avenue, 17th Floor, Wilmington, Delaware. Deponent shall produce any and all records set forth in the attached Exhibit A.

PLEASE TAKE FURTHER NOTICE, that the deposition will be taken before a notary public or other officer authorized to administer oaths. The deposition shall be recorded by stenographic means as well as by videotape.

Dated: April 6, 2006

ASHBY & GEDDES, P.A.

By: 

Philip Trainer (DE Bar ID # 2788)

Ricardo Palacio (DE Bar ID # 3765)

222 Delaware Avenue

17th Floor

P.O. Box 1150

Wilmington, Delaware 19899

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Attorneys for Defendant Banc One Building
Corporation

168352.1

EXHIBIT A

1. Any and all documents in your possession relating to work done by Creedon Controls, Inc. ("Creedon") at the Banc One Core Data Center in Wilmington, Delaware (the "Project"), including, *inter alia*, contract documents, e-mail and other correspondence, and records of costs and expenses.
2. Any and all documents in your possession relating to the costs of and staffing on all other work done by Creedon during the same period Creedon was working on the Project.
3. Any and all documents in your possession relating to all discussion, negotiations, correspondence, and communication with regard to the formulation of any contract between Creedon Controls, Inc. ("Creedon") and Banc One Building Corporation ("Banc One") and/or Forest Electric Corporation ("Forest Electric") related to work to be performed by Creedon at the Banc One Core Data Center in Wilmington, Delaware (the "Project").
4. Any and all documents in your possession relating to the nature and extent of the contractual obligations of Creedon with respect to the Project.